

Raajen V. Bhaskar, Esq. (RB0296)
SCHENCK, PRICE, SMITH & KING, LLP
351 Sparta Avenue
Sparta, NJ 07871
(973) 295-3670
Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW JERSEY

JAMES EVERETT
SHELTON,

Plaintiff,

vs.

MERCHANT FLOW FIN.
CORP., *et al.*

Defendants.

Civil Action No. 2:18-cv-11294

**Notice of Motion to Set Aside
Default Pursuant to FRCP
55(C) and Extend Time to
Answer the Complaint
Pursuant to FRCP 6(b)(1)(B)**

**TO: James Everett Shelton, *pro se*
316 Covered Bridge Road
King of Prussia, PA 19406**

Sir:

PLEASE TAKE NOTICE that, on January 22, 2019 at 9:00 am, or as soon thereafter as counsel may be heard, the undersigned, attorneys for the defendants, Merchant Flow Financial Corp. (“Merchant Flow”) and Conroy Williamson (“Williamson”), will apply to the Court for an Order denying the pending motion for entry of a judgment by default, setting aside

the default entered in this matter pursuant to FRCP 55 and extend the time within which Defendants may answer the complaint pursuant to FRCP 6(b)(1)(B), a proposed form of which is annexed hereto.

PLEASE TAKE FURTHER NOTICE that, in support of the relief sought herein, the undersigned shall rely upon the attached certifications of counsel and Williamson, together with all exhibits attached thereto. Oral argument is not requested.

SCHENCK, PRICE, SMITH & KING, LLP
*Attorneys for Merchant Flow Fin.
Corp., and Conroy Williamson*

Dated: 12/28/18 By: /s/ Raajen V. Bhaskar
Raajen V. Bhaskar, Esq.